

**Grants Coordination and School Support  
School Nutrition Training and Programs**

## **Requirements for an Improvement Plan for Certification and Verification**

An Improvement Plan for Certification and Verification is required if your school district reported during School Year 2007-2008: (1) less than 80% of the applications selected for verification did not respond to your request for additional income information, and (2) over 20% of the free and reduced price applications in your reported verification sample were changed to paid. The plan must contain actions all required by The Child Nutrition and WIC Reauthorization Act of 2004 (P.L. 108-265) and should include one or both of the optional actions set forth by the law.

**Required** actions to help maintain benefits for eligible students:

- Establish a toll-free or local telephone number for which there is no charge for parents to call for assistance with verification. Parents and/or guardians often need assistance in gathering data to qualify for benefits.
- All approved household applications selected for verification must be reviewed for accuracy to ensure that initial eligibility determinations are correct. The review must be done by an individual other than the individual making the initial determination. The requirement for a confirmation review is waived if the LEA is using a technology based solution that demonstrates a high level of accuracy in processing initial determinations.
- If the confirmation review finds that the initial determination was incorrect, the LEA must: (1) correct the household eligibility status and (2) notify the household of the change. If the review indicates the household is not eligible for either free or reduced meals, the household must be notified of the reason and informed that the household may reapply with income documentation.
- Verification follow-up activities are required by LEAs and must be documented. A specific person within the LEA must be identified to families/households as being able to directly assist in completing verification.
- The LEA must follow-up if a household cannot obtain assistance during the initial call. If the household fails to respond to the initial request for verification information, the LEA must make at least one attempt to obtain necessary verification. The attempt may be through the mail, by telephone, by e-mail, or through personal contact. All attempts and results must be documented by the LEA. If follow-up attempt(s) fail, the household benefits must be terminated through a written notice of adverse action.
- Direct Certification is required. Each local educational agency (LEA) must directly certify children who are members of households receiving assistance under the Food Stamp Program (Food Assistance Program) as eligible for free school meals, without further application. The Direct Certification Report is available via the Center of Educational Performance and Information (CEPI) Student Data System (SDS).

- LEAs verifying income eligibility for free and reduced price meals must allow households to provide documentation of income for any point in time between the month prior to application and the time the household is required to provide income documentation. Implementation memoranda are found at: [www.fns.usda.gov/cnd/lunch](http://www.fns.usda.gov/cnd/lunch). Click on Reauthorization Memoranda for 2004; click on "Verification of Income Eligibility–SP-5" and "Verification Activities – March 10, 2005."

Optional activities for LEAs that may lower the non-response rate and prevent eligible students from losing benefits:

- The LEA, on individual review may remove up to 5% of applications in the selected sample if factors such as household stability and communication difficulties may interfere with verification. Any application removed from the sample must be replaced with another application approved on the same basis.
- The LEA may contract with a third party to assist with the required follow-up activity. Any third party is subject to confidentiality requirements outlined in current regulations.

If your name is on the Schools Required to Submit an Improvement Plan for Certification and Verification list, you must submit the attachment Improvement Plan for Certification and Verification to MDE by November 15.